

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

**NOVEMBER 2021 GRAND JURY
(Impaneled November 5, 2021)**

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

Violations:

ROBERT CALKINS JR.

Title 18, United States Code,
Sections 2251(a), 2252(e),
2252A(a)(2)(A), 2252A(b)(1),
2252A(a)(5)(B), and 2252A(b)(2)
(10 Counts and Forfeiture Allegation)

COUNT 1

(Production of Child Pornography)

The Grand Jury Charges That:

On or about December 2, 2018, in the Western District of New York, the defendant, ROBERT CALKINS JR., did employ, use, persuade, induce, entice, and coerce a minor, that is, Victim 1, a person known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is, a digital file bearing the name 1570921574478.jpg, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 2

(Production of Child Pornography)

The Grand Jury Charges That:

On or about December 10, 2019, in the Western District of New York, the defendant, ROBERT CALKINS JR., did employ, use, persuade, induce, entice, and coerce a minor, that is, Victim 1, a person known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is, a digital file bearing the name wasp-1128141210, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 3

(Production of Child Pornography)

The Grand Jury Charges That:

On or about December 10, 2019, in the Western District of New York, the defendant, ROBERT CALKINS JR., did employ, use, persuade, induce, entice, and coerce a minor, that is, Victim 1, a person known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, that is, a digital file bearing the name wasp-986842497, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 4

(Receipt of Child Pornography)

On or about December 13, 2019, in the Western District of New York, and elsewhere, the defendant, ROBERT CALKINS JR., did knowingly receive, and attempt to receive, child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, an image file titled “calkinsrobert654@gmail.com-2600749314980115612.jpg” located on a Samsung Galaxy S7 cell phone, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).

COUNT 5

(Receipt of Child Pornography)

On or about December 29, 2019, in the Western District of New York, and elsewhere, the defendant, ROBERT CALKINS JR., did knowingly receive, and attempt to receive, child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, an image file titled “0_306 (1).jpg” located on a Samsung Galaxy J3 Luna Pro ModelSW-S327VL cell phone, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).

COUNT 6

(Receipt of Child Pornography)

On or about June 15, 2020, in the Western District of New York, and elsewhere, the defendant, ROBERT CALKINS JR., did knowingly receive, and attempt to receive, child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, an image file titled “a1111.jpg” located on a Samsung Galaxy S9 Model SM-G960U cell phone, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).

COUNT 7

(Receipt of Child Pornography)

On or about September 9, 2020, in the Western District of New York, and elsewhere, the defendant, ROBERT CALKINS JR., did knowingly receive, and attempt to receive, child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, an image file titled “53.jpg” located on a Samsung Galaxy S7 Model SM-G930VL cell phone, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).

COUNT 8

(Possession of Child Pornography)

On or about September 10, 2020, in the Western District of New York, the defendant, ROBERT CALKINS JR., did knowingly possess material, that is, a Samsung Galaxy J3 Luna Pro Model SM-S327VL, that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which involved a prepubescent minor and a minor who had not attained 12 years of age, that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

COUNT 9

(Possession of Child Pornography)

On or about September 10, 2020, in the Western District of New York, the defendant, ROBERT CALKINS JR., did knowingly possess material, that is, a Samsung Galaxy S9 Model SM-G960U, that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which involved a prepubescent minor and a minor who had not attained 12 years of age, that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been

produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

COUNT 10

(Possession of Child Pornography)

On or about September 10, 2020, in the Western District of New York, the defendant, ROBERT CALKINS JR., did knowingly possess material, that is, a Samsung Galaxy S7 Model SM-G930VL, that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which involved a prepubescent minor and a minor who had not attained 12 years of age, that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of any of the offenses set forth in Counts 1 through 10 of this Indictment, the defendant, ROBERT CALKINS JR., shall forfeit to the United States any

matter which contains any such visual depiction of child pornography which was produced, transported, mailed, shipped, and received, and any and all property, real and personal, used and intended to be used to commit and promote the commission of such offense, and all property traceable to such property, including but not limited to the following:

- a. Samsung Galaxy J3 Luna Pro Model SM-S327VL;
- b. Samsung Galaxy S9 Model SM-G960U; and
- c. Samsung Galaxy S7 Model SM-G930VL.

All pursuant to Title 18, United States Code, Sections 2253(a)(1) and 2253(a)(3).

DATED: Buffalo, New York, August 23, 2022.

TRINI E. ROSS
United States Attorney

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A TRUE BILL:

S/FOREPERSON
FOREPERSON